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Attorneys for Defendants
CITY OF HENDERSON and
CHIEF PATRICK MOERS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HARVESTER HARRIS,

Plaintiff,

CASE NO.: 2:15-CV-00337-GMN-PAL

v.

CITY OF HENDERSON; a political
subdivision of the State of Nevada; LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
State of Nevada; SHERIFF DOUG
GILLESPIE, individually; CHIEF PATRICK
MOERS, individually; DOE OFFICER I,
individually; DOE OFFICER II, individually;
DOE OFFICERS III-X; and JOHN DOES I-
X, inclusive,

Defendants.

**STIPULATON AND ORDER TO EXTEND TIME TO FILE DEFENDANTS REPLY IN
SUPPORT OF THEIR MOTION TO DISMISS
(First Request)**

Pursuant to Local Rule 6-1, Plaintiff, HARVESTER HARRIS, by and through his
attorney Cal J. Potter, III, Esq., of the POTTER LAW OFFICES, and Defendants CITY OF

CITY ATTORNEY'S OFFICE
CITY OF HENDERSON
240 S. WATER STREET MSC 144
HENDERSON, NV 89015



1 HENDERSON and PATRICK MOERS (“HENDERSON Defendants”), by and through their
2 attorneys Josh M. Reid, City Attorney and Nancy D. Savage, Assistant City Attorney for
3 the CITY OF HENDERSON, hereby stipulate and make a joint application to extend the
4 time to file the HENDERSON Defendants’ Reply in support of their Motion to Dismiss in
5 this matter.
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- 7 1. HENDERSON Defendants filed their Motion to Dismiss (Doc. 12) on May 4,
8 2015;
- 9 2. Plaintiffs filed their Opposition (Doc. 17) on June 1, 2015;
- 10 3. The Defendants are seeking a twelve (12) day extension to file the Reply, up to
11 and including Tuesday, June 23, 2015;
- 12 4. The parties submit that good cause exists for this extension as HENDERSON
13 Defendants’ counsel was out of state the week of June 1, 2015 and returned to
14 the office on June 8, 2015 to numerous matters which had previously been
15 scheduled. As a result there is insufficient time for the HENDERSON
16 Defendants’ counsel to prepare a complete and adequate Reply to the Plaintiff’s
17 Opposition;
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1 5. This is the first request for enlargement of time for the HENDERSON
2 Defendants to file their Reply, which is being made in good faith and not for the
3 purposes of delay.

4 APPROVED AS TO FORM AND CONTENT.

5 DATED this 8th day of June, 2015.

7 POTTER LAW OFFICES

CITY OF HENDERSON
JOSH M. REID, City Attorney

9 /s/ Cal J. Potter

/s/ Nancy D. Savage

10 CAL J. POTTER, III, ESQ.
11 Nevada Bar No. 1988
12 1125 Shadow Lane
13 Las Vegas, Nevada 89102
14 Attorney for Plaintiff

JOSH M. REID, ESQ.
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Nevada Bar No. 7497
NANCY D. SAVAGE, ESQ.
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Nevada Bar No. 392
240 Water Street, MSC 144
Henderson, Nevada 89009
Attorney for Defendants

16 **ORDER**

17 IT IS SO ORDERED this 9th day of June, 2015.

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23 _____
24 Gloria M. Navarro, Chief Judge
25 United States District Court
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